

# **Exhibit C**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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YELENA RUDERMAN,	:	19CV2987 (CBA)
Plaintiff,	:	
v.	:	United States Courthouse
	:	Brooklyn, New York
LAW OFFICE OF YURIY PRAKHIN,	:	
P.C., and YURIY PRAKHIN, in	:	
both his individual	:	December 19, 2022
and professional capacities,	:	2:00 p.m.
Defendants.	:	

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TRANSCRIPT OF CIVIL CAUSE FOR PRETRIAL CONFERENCE  
BEFORE THE HONORABLE CAROL B. AMON  
UNITED STATES DISTRICT JUDGE

A P P E A R A N C E S:

FOR THE PLAINTIFF: FARUQI & FARUQI, LLP  
685 THIRD AVENUE, 26TH FLOOR  
NEW YORK, NEW YORK 10017  
BY: INNESSA M. HUOT, ESQ.  
ALEX J. HARTZBAND, ESQ.

TILTON BELDNER LLP  
626 RXR PLAZA  
UNIONDALE, NY 11556  
BY: JOSHUA BELDNER, ESQ.

FOR THE DEFENDANTS: BOND SCHOENECK & KING, PLLC  
600 THIRD AVENUE, 22ND FLOOR  
NEW YORK, NEW YORK 10016  
BY: MARY ELLEN DONNELLY, ESQ.  
LOUIS DILORENZO, ESQ.  
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Court Reporter: SOPHIE NOLAN  
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Proceedings

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1 lying about that.

2 Is that going to be the defendants' position?

3 MS. DONNELLY: We are not claiming she lied about  
4 her applications.

5 THE COURT: So I don't think we need to call those  
6 witnesses.

7 MR. BELDNER: Okay. There is one more?

8 MS. HUOT: Levitsky is good but Grossman is out.

9 MR. BELDNER: Grossman is out.

10 THE COURT: Manassis is out you said. Sgouras is  
11 out. Guaneri is out.

12 MR. BELDNER: Yes, sir.

13 THE COURT: Bogoraz is out. Shalom is out.

14 MS. HUOT: Yes, sir.

15 THE COURT: Tanya Ruderman is out.

16 MS. HUOT: Yes.

17 MR. BELDNER: Yes. There is one other witness  
18 though, Your Honor, that we did not discuss, Peter Coates.

19 MS. HUOT: He is number 13 on page eight.

20 THE COURT: What is it that you want to -- because  
21 I'm a little bit concerned about his testimony as a matter of  
22 substance. What is it that you expect him to testify to?

23 MR. BELDNER: Well, Mr. Coates, and we acknowledge  
24 he was not disclosed because we didn't know about him until  
25 May of 2022, but Mr. Coates will testify that he was directed

1 by Mr. Prakhin and his office manager, Ms. Raskin, to delete  
2 our client's Saga entry notes.

3 And one of the reasons -- one of the primary reasons  
4 for the termination being proffered by the defendants was our  
5 client's lack of Saga notes. And he will testify that he was  
6 directed to delete her Saga notes and that when he said, no,  
7 he observed other individuals, including the defendant -- an  
8 individual listed in defendants' witness list, Mr. Pusachev go  
9 in and manipulate Saga notes.

10 That's why his testimony is, we believe, crucial,  
11 and we never had an opportunity to question Mr. Prakhin or  
12 Ms. Raskin about this because this only came about after  
13 summary judgment had been decided. We assume and we will  
14 question them at trial about this. We assume they're going to  
15 deny it and so Mr. Coates can certainly be offered to rebut or  
16 impeach their testimony.

17 THE COURT: But what about the firm's culture of  
18 unethical conduct, discrimination and retaliation, what is  
19 that about?

20 MR. BELDNER: I don't believe that he would be  
21 offering any kind of testimony regarding that. His testimony  
22 would be limited to what he directly observed with respect to  
23 actions taken with respect to our client and Saga entries and  
24 the management of the Saga entries.

25 THE COURT: That's a pretty critical witness. From,